

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF LOUISIANA  
LAFAYETTE DIVISION**

THE STATE OF ARIZONA, et al.,

PLAINTIFFS,

v.

MERRICK GARLAND in his official capacity  
as Attorney General of the United States of  
America; et al.,

DEFENDANTS.

CIVIL ACTION NO. 6:22-cv-01130

**PUBLIC DECLARATION OF CHANCELLOR PAUL BURNS**

I, Paul Burns, declare as follows:

1. I am the Chancellor of the Division of Public Schools at the Florida Department of Education (“FDOE”). I am over the age of 18, I have personal knowledge of the facts contained in this Declaration, and I could competently testify to the contents of this Declaration if called upon to do so.

2. In the regular and ordinary course of its activities, FDOE creates and maintains records regarding students enrolled in Florida public schools. Those records are created at or near the time of the associated event by – or from information transmitted by – someone with knowledge.

3. Attached as Exhibit 110 is a summary of records maintained by FDOE reflecting the number of Immigrant Students enrolled in Florida public schools. Immigrant Students are defined in accordance with 20 U.S.C. 7011(5) as “individuals who – (A) are aged 3 through 21; (B) were not born in any State; and (C) have not been attending one or more schools in any one or more States for more than 3 full academic years.”

4. Attached as Exhibits 111 - 114 are true and accurate copies of the annual Final Calculation for the Florida Education Finance Program. These documents reflect the calculation of state-provided education funding required by the Florida Constitution.

5. Further declarant sayeth naught.

I DECLARE UNDER PENALTY OF PERJURY UNDER THE LAWS OF THE UNITED STATES OF AMERICA AND THE STATE OF LOUISIANA THAT THE FOREGOING IS TRUE AND CORRECT.

Executed in LEON COUNTY, FLA., this 19<sup>TH</sup> day of January 2024.

  
Paul Burns, Chancellor